

**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

UNITED STATES OF AMERICA,)	
)	
Appellee,)	
)	
v.)	No. 21-3032
)	
THEODORE DOUGLAS,)	
)	
Appellant.)	

**UNOPPOSED MOTION FOR 30-DAY EXTENSION OF TIME
WITHIN WHICH TO FILE APPELLANT'S OPENING BRIEF**

Appellant Theodore Douglas, through undersigned counsel, respectfully moves this Court, pursuant to Circuit Rule 27(h), for a 30-day extension of time, from March 25, 2022, to April 25, 2022, to file his opening brief.

As grounds for this motion, undersigned counsel states:

1. Mr. Douglas pled guilty in this matter to possession of a firearm by a person previously convicted of a felony in violation of 18 U.S.C. § 922(g), and on May 24, 2021 was sentenced to 15 months' incarceration followed by three years' supervised release. Though Mr. Douglas has completed his sentence in this matter, he remains on supervised release.
2. This Court set a briefing schedule under which appellant's opening brief is due on March 25, 2022.

3. Counsel has completed a review of the record and consulted with Mr. Douglas concerning the scope of the issues to be raised on appeal. Due to other obligations before the District Court, counsel regrettably has not completed the opening brief. In particular, counsel has been involved in litigation related to the events of January 6, 2020, and also litigation relating to the selection and composition of juries in this district. Each of these matters have been resource intensive, involving substantial investigation and research of constitutional issues of first impression, while also requiring review of significant discovery and juror records. Counsel anticipates that with the additional requested time, he will be able to complete Mr. Douglas's opening brief.
4. Counsel for the government has indicated that it does not oppose this request for extension of time.

WHEREFORE, appellant respectfully requests that this Court grant his motion for a 30-day extension of time to file his opening brief and order it due no sooner than April 25, 2022.

Respectfully submitted,

A. J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/

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**CERTIFICATE OF COMPLIANCE
WITH TYPE-VOLUME LIMITATION**

I hereby certify, pursuant to Federal Rule of Appellate Procedure 32(a), that the foregoing Motion for Extension was prepared in monospaced typeface using Microsoft Word in Century Schoolbook 14-point font and contains 298 words in compliance with the Court's type-volume limits.

/s/

TONY AXAM, JR.
Assistant Federal Public Defender